

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

TÜRKİYE HALK BANKASI A.Ş.,

Defendant.

S6 15 Cr. 867 (RMB)

DEFENDANT TÜRKİYE HALK BANKASI A.Ş.'S MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and materials cited therein, the undersigned will move this Court before the Honorable Richard M. Berman, in Room 17B of the United States District Court, 500 Pearl Street, New York, New York, 10007, for an order dismissing the Indictment. Defendant is compelled to file this Motion pursuant to the Court's Order of June 30, 2020, and by filing this Motion does not waive its position that the assigned judge should be recused from this case as set forth in its Motion to Recuse the Court filed on July 14, 2020.

PLEASE TAKE FURTHER NOTICE, that pursuant to the Court's June 30, 2020, Order, opposition papers, if any, shall be served by August 31, 2020, and reply papers, if any, shall be served by September 7, 2020, with argument to be heard at a date and time to be set by the Court.

Halkbank respectfully requests oral argument on this motion.

Dated: August 10, 2020

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

/s Robert M. Cary

Robert M. Cary
Simon A. Latcovich
James W. Kirkpatrick
Damayanti Desai
725 Twelfth Street, N.W.
Washington, DC 20005

650 Fifth Avenue, Suite 1500
New York, NY 10019
Phone: (202) 434-5000
Fax: (202) 434-5029
E-mail: rcary@wc.com
slatcovich@wc.com
jkirkpatrick@wc.com
ddesai@wc.com